

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

HOBART CORPORATION,)	
KELSEY-HAYES COMPANY, and)	No. 3:13-cv-115
NCR CORPORATION,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
THE DAYTON POWER AND LIGHT)	
COMPANY, et al.,)	
)	
Defendants.)	

Plaintiffs disclose the following amended list of lay witnesses. The subject Defendant is included below where applicable.

PLAINTIFFS' AMENDED LAY WITNESSES

1. Jack Akers
Harris Corporation, *as successor to Harris-Seybold Co.*
2. Robert Aldredge
Exemption 6 -Personal Privacy
Englewood, Ohio 45322
Exemption 6 -Personal Privacy
See deposition.
3. Kenneth Anderson
ConAgra Grocery Products Co., LLC, *as successor to McCall Corp.*
4. Scott Arentsen
The Dayton Power and Light Company.
5. Robert Arndts
Exemption 6 -Personal Privacy
Dayton, Ohio 45414

Exemption 6 -Personal Privacy

Flowserve Corporation *as successor to* Duriron Corporation.

6. Tim Bailey
The Sherwin-Williams Company.
7. Jerry Baker
See deposition.
8. John Baker
The Dayton Power and Light Company.
9. Thomas Beal
Exemption 6 -Personal Privacy
Dayton, Ohio 45459
Exemption 6 -Personal Privacy
See deposition.
10. B.D. Beatty
Exemption 6 -Personal Privacy
Dayton, OH 45429
Coca-Cola Refreshments USA, Inc., *as successor to* Dayton Coca-Cola Bottling Co.
11. George Beemsterboer
Monsanto Company, *a/k/a* Monsanto Research Company, *n/k/a* Pharmacia Corporation.
12. Estle Bernard
Exemption 6 -Personal Privacy
Miamisburg, OH 45342
Harris Corporation, *as successor to* Harris-Seybold Co.
13. William Bines
Former Sanitarian, Montgomery County Health District.
May have knowledge of inspections and compliance monitoring of the Site in the late 1960s through the 1970s, operations, types of waste disposed of, identity of generators and transporters of waste to the Site, and methods of disposal at the Site during that time period.
14. Robert Bleazard, PE
Senior HS&E Manager – Environmental Remediation
ZF TRW Automotive Inc.

11202 E. Germann Road
Mesa, Arizona 85212
Current employee; please contact through Plaintiffs' counsel.
Kelsey-Hayes Company.

15. Horace Boesch Jr.
Exemption 6 -Personal Privacy
Dayton, Ohio 45406
See depositions.
16. John Boltz
Harris Corporation, *as successor to* Harris-Seybold Co.
17. Boss Bowlin
Exemption 6 -Personal Privacy
Carlisle, OH 45005
Exemption 6 -Personal Privacy
Kimberly-Clark Corporation.
18. Mark Bowling
Waste Management of Ohio, Inc., as successor to Industrial Waste Disposal Co. Inc., and to Blaylock Trucking and Waste Removal, and to SCA Services of Ohio, Inc., and to Container Services, Inc. a/k/a Container Service, Inc., and to General Refuse Service, Inc., and to Container Service Co., and to General Sanitation Corporation.
19. Chris Bridges
The Peerless Transportation Company.
20. Ken Brown, CHMM
Manager of Environmental and Chemical Compliance
Illinois Tool Works Inc.
155 Harlem Avenue
Glenview, IL 60025
Current employee; please contact through Plaintiffs' counsel.
Hobart Corporation.
21. Tracy Buchanan
Former employee of the Montgomery County Health District.
May have knowledge of inspections and compliance monitoring of the Site during the 1980s and 1990s, operations, types of waste disposed of, identity of generators and transporters of waste to the Site, and methods of disposal at the Site during that time period.
22. William Burrell Sr.

Harris Corporation, *as successor to* Harris-Seybold Co.

23. Earl Campbell
Harris Corporation, *as successor to* Harris-Seybold Co.
24. James Campbell
Engineering Management, Inc.
1500 Ardmore Boulevard, Suite 502
Pittsburgh, PA 15221
412-244-0917
Overall dollars spent; PRP search costs.
25. Joe Caperna
Exemption 6 -Personal Privacy
Beavercreek, OH 45434
Exemption 6 -Personal Privacy
Cox Media Group Ohio, Inc., *as successor to* Dayton Daily News
and to Dayton Journal Herald.
26. Ellis Carver
Exemption 6 -Personal Privacy
Dayton, OH 45420
Exemption 6 -Personal Privacy
Coca-Cola Refreshments USA, Inc., *as successor to* Dayton Coca-Cola Bottling Co.
27. Anthony B. Cibulka
Flowserve Corporation *as successor to* Duriron Corporation.
28. Dan Crago
Valley Asphalt Corporation.
29. Timothy Crotty
Van Dyne-Crotty Co., *as successor to* Van Dyne-Crotty, Inc.
30. Thomas Ctvrtnicek
See deposition.
31. Gary Dabney
Exemption 6 -Personal Privacy
Clayton, OH 45315
Exemption 6 -Personal Privacy
Flowserve Corporation *as successor to* Duriron Corporation
32. John W. Davis

Exemption 6 -Personal Privacy

Dayton, Ohio 45417

Exemption 6 -Personal Privacy

See deposition.

33. Jake Derksen

Exemption 6 -Personal Privacy

Bethel Township, OH

Exemption 6 -Personal Privacy

Coca-Cola Refreshments USA, Inc., *as successor to* Dayton Coca-Cola Bottling Co.

34. William R. Dybvad

Exemption 6 -Personal Privacy

Dayton, OH 45424

Exemption 6 -Personal Privacy

See deposition.

35. Ken Eakins

Valley Asphalt Corporation.

36. Greg Edsall

Exemption 6 -Personal Privacy

Dayton, OH 45459

Exemption 6 -Personal Privacy

The Sherwin-Williams Company.

37. Gary Elam

City of Dayton, Ohio.

38. John Eichstadt

Valley Asphalt Corporation.

39. Richard L. Fahrenholz

Exemption 6 -Personal Privacy

Palmetto, FL 34221

Exemption 6 -Personal Privacy

See deposition.

40. Charles L. Fields

Exemption 6 -Personal Privacy

Dayton, Ohio 45406

See deposition.

41. William Fleckenstein

Exemption 6 -Personal Privacy

Xenia, Ohio 45385
Exemption 6 -Personal Privacy

See deposition.

42. Richard Foley
Harris Corporation, *as successor to* Harris-Seybold Co.
43. Xonerale Freeman
See deposition.
44. Fred Gentry
Kimberly-Clark Corporation.
45. William Gilman
Exemption 6 -Personal Privacy
West Carrollton, OH 45449
Exemption 6 -Personal Privacy
Kimberly-Clark Corporation.
46. Russell Gilmore III
Exemption 6 -Personal Privacy
Tipp City, OH 45371
Exemption 6 -Personal Privacy
The Peerless Transportation Co.
May have knowledge of operations, customers, transporters to the Site, and hazardous substances disposed of at the Site.
47. D. Gerald Glasgow
Exemption 6 -Personal Privacy
Dayton, OH 45135
Exemption 6 -Personal Privacy
Former employee of Monsanto Company; may have knowledge of the historic activities of Defendant which have resulted in the discharge, release, or disposal, of hazardous substances, contaminates, or pollutants at or adjacent to the Site.
48. Tom Glass
Former Sanitarian, Montgomery County Health District.
May have knowledge of inspections and compliance monitoring of the Site, operations, types of waste disposed of, identity of generators and transporters of waste to the Site, and methods of disposal at the Site.
49. Art Gray
Dayton Industrial Drum, Inc.

50. Randall Griffin
The Dayton Power and Light Company.
51. David Grillot
Exemption 6 -Personal Privacy
Dayton, Ohio 45459
Exemption 6 -Personal Privacy
See deposition.
52. Edward Grillot
See depositions.
53. Clarence Hamm
Kimberly-Clark Corporation.
54. Willie Hardy
Exemption 6 -Personal Privacy
Clayton, Ohio 45315
Exemption 6 -Personal Privacy
See deposition.
55. Richard Hart
Exemption 6 -Personal Privacy
Dayton, Ohio 45429
Exemption 6 -Personal Privacy
See deposition.
56. Richard Hartle
See deposition.
57. Julian Hayward
GHD
651 Colby Drive
Waterloo, Ontario N2V 1C2
519-884-0510
Work performed in VI and RI/FS; consistency with NCP; releases at Site; connection between releases and incurrence of response costs.
58. Bryan Heath
NCR Corporation.
3097 Satellite Blvd, Building 700
Duluth, GA 30097
Current employee; please contact through Plaintiffs' counsel.
NCR Corporation.

59. Luther Henry
Exemption 6 -Personal Privacy
Dayton, Ohio 45417
Exemption 6 -Personal Privacy
See deposition.
60. Gary Herman
Harris Corporation, *as successor to* Harris-Seybold Co.
61. Ralph High
Valley Asphalt Corporation.
62. Robert Hipp
Exemption 6 -Personal Privacy
The Dayton Power and Light Company.
63. William Hopkins
Harris Corporation, *as successor to* Harris-Seybold Co.
64. David Hussong
Exemption 6 -Personal Privacy
Dayton, OH 45431
See deposition.
65. Thomas Hut
Former Sanitarian, Montgomery County Health District.
May have knowledge of inspections and compliance monitoring of the Site during the 1980s and 1990s, operations, types of waste disposed of, identity of generators and transporters of waste to the Site, and methods of disposal at the Site during that time period.
66. Victor Infanto
Exemption 6 -Personal Privacy
Centerville, OH 45449
Exemption 6 -Personal Privacy
DAP Products Inc. *as successor to* DAP, Inc.; La Mirada Products Co., Inc., *formerly known as* DAP, Inc.
67. Edward Jenkins
Exemption 6 -Personal Privacy
Lewis Center, Ohio 43035
Exemption 6 -Personal Privacy
See deposition.
68. Ken Jewell

The Dayton Power and Light Company.

69. Marshall Jones
Dayton Industrial Drum, Inc.

70. Henry Jordan
Exemption 6 -Personal Privacy
Dayton, Ohio 45439
Exemption 6 -Personal Privacy
See deposition.

71. Jim Jurgensen
Valley Asphalt Corporation.

72. Jim Jurgensen II
Valley Asphalt Corporation.

73. Gary King
Dayton Industrial Drum, Inc.

74. Larry King
Exemption 6 -Personal Privacy
Dayton, OH 45404
Dayton Industrial Drum, Inc.

75. Joseph P. Kwan
Corporate Director, Environmental Remediation
Northrop Grumman Corporation
Please contact through Gabe Calvo, Northrop Grumman
Corporation Law Department, 2980 Fairview Park Drive, Falls
Church, VA 22042-4511, 703-280-4092.
Kelsey-Hayes Company.

76. Melvin Layer
The Dayton Power and Light Company.

77. Glenn Leis
Exemption 6 -Personal Privacy
Lebanon, OH 45036
Exemption 6 -Personal Privacy
See deposition.

78. James Leiter
Former Sanitarian, Montgomery County Health District
May have knowledge of inspections and compliance monitoring of
the Site, operations, types of waste disposed of, identity of

generators and transporters of waste to the Site, and methods of disposal at the Site.

79. Charles Lewis
Former Sanitarian Inspector, Montgomery County Health District.
May have knowledge of inspections and compliance monitoring of the Site, operations, types of waste disposed of, identity of generators and transporters of waste to the Site, and methods of disposal at the Site.
80. Michael Manzo
See deposition.
81. Cathy McCoy
The Peerless Transportation Company.
82. Jim T. McDonald
Exemption 6 -Personal Privacy
Dayton, OH 45449
Exemption 6 -Personal Privacy
See deposition.
83. Hershell Todd Million
Dayton Industrial Drum Inc.
84. Bill Mills
The Dayton Power and Light Company
85. Robert Michigan
Exemption 6 -Personal Privacy
Kettering, OH 45440
Cox Media Group Ohio, Inc., *as successor to* Dayton Daily News and to Dayton Journal Herald.
86. James Minor
DAP Products Inc. *as successor to* DAP, Inc.; La Mirada Products Co., Inc., *formerly known as* DAP, Inc.
87. Frank Miracle
Bridgestone Americas Tire Operations, LLC, *as successor to* The Dayton Tire & Rubber Company; Bridgestone/Firestone, Inc. *f/k/a* The Dayton Tire & Rubber Company.
Deceased; see deposition in prior matter, to be produced.
88. Joe Moore
Exemption 6 -Personal Privacy

Springfield, OH 45504

Exemption 6 -Personal Privacy

Former employee of Ohio EPA, DSHWM, SWDO.

May have knowledge of inspections and compliance monitoring of the Site, operations, types of waste disposed of, identity of generators and transporters of waste to the Site, and methods of disposal at the Site.

89. George Morris Jr.
See deposition.

90. James Morris
Harris Corporation, *as successor to* Harris-Seybold Co.

91. Gale O'Brien
Former Sanitarian, Montgomery County Health District.
May have knowledge of inspections and compliance monitoring of the Site in the late 1960s through the 1970s, operations, types of waste disposed of, identity of generators and transporters of waste to the Site, and methods of disposal at the Site during that time period.

92. Bill Osman
Dayton Industrial Drum, Inc.

93. Dean Ottoson
Exemption 6 -Personal Privacy
Dayton, OH 45424
Exemption 6 -Personal Privacy

Former operator of Ottoson Solvents on the northern portion of the Site now owned by Valley Asphalt.

May have knowledge of operations, customers, transporters to the Site, and hazardous substances disposed of at the Site, including burial of still bottoms at the Site.

94. Marshall (Bill) Patterson
The Sherwin-Williams Company.

95. Joseph Pizzino
Exemption 6 -Personal Privacy
Dayton, OH 45414
Exemption 6 -Personal Privacy

See deposition.

96. Charlotte Quigley
Kimberly-Clark Corporation.

97. Michael Quigley
Exemption 6 -Personal Privacy
Clearwater, FL 33759-1210
Exemption 6 -Personal Privacy

Waste Management of Ohio, Inc., *as successor to* Industrial Waste Disposal Co. Inc., and to Blaylock Trucking and Waste Removal, and to SCA Services of Ohio, Inc., and to Container Services, Inc. *a/k/a* Container Service, Inc., and to General Refuse Service, Inc., and to Container Service Co., and to General Sanitation Corporation.

98. Stephen Quigley
GHD
651 Colby Drive
Waterloo, Ontario N2V 1C2
519-884-0510
Work performed in VI and RI/FS; consistency with NCP; releases at Site; connection between releases and incurrence of response costs.

99. Kathy Rabbit
Monsanto Company, *a/k/a* Monsanto Research Company, *n/k/a* Pharmacia Corporation.

100. Ernest Rader
Harris Corporation, *as successor to* Harris-Seybold Co.

101. Larry Rankin
Exemption 6 -Personal Privacy
Fairborn, Ohio 45324
Exemption 6 -Personal Privacy
See deposition.

102. Earl Reeder Jr.
Coca-Cola Refreshments USA, Inc., *as successor to* Dayton Coca-Cola Bottling Co.

103. Robert Reis
Harris Corporation, *as successor to* Harris-Seybold Co.

104. Frederick Rice
Harris Corporation, *as successor to* Harris-Seybold Co.
105. Thomas Richie Jr.
The City of Dayton, Ohio
106. Robert Saltgaver
Exemption 6 -Personal Privacy
Beaver, OH 45613
Exemption 6 -Personal Privacy
Bridgestone Americas Tire Operations, LLC, as successor to The
Dayton Tire & Rubber Company; Bridgestone/Firestone, Inc. f/k/a
The Dayton Tire & Rubber Company.
107. G.L. Scandrick
Exemption 6 -Personal Privacy
Dayton, Ohio 45417
Exemption 6 -Personal Privacy
See deposition.
108. Robert Scarborough
The Dayton-Power and Light Company.
109. Robert Seilheimer
DAP Products Inc. *as successor to* DAP, Inc.; La Mirada Products
Co., Inc., *formerly known as* DAP, Inc.
110. David Shellhaas
Exemption 6 -Personal Privacy
West Milton, OH 45383
Exemption 6 -Personal Privacy
The Dayton Power and Light.
111. Joseph Smart
Exemption 6 -Personal Privacy
Huber Heights, Ohio
See deposition.
112. John Smelko
Exemption 6 -Personal Privacy
West Carrollton, OH 45449
Exemption 6 -Personal Privacy
Kimberly-Clark Corporation.
113. Jim South

Exemption 6 -Personal Privacy

Dayton, Ohio 45432
See deposition.

114. Thomas Spence

Exemption 6 -Personal Privacy

Springboro, OH 45066

Exemption 6 -Personal Privacy

See deposition.

115. John Stitt

Waste Management of Ohio, Inc., as successor to Industrial Waste Disposal Co. Inc., and to Blaylock Trucking and Waste Removal, and to SCA Services of Ohio, Inc., and to Container Services, Inc. a/k/a Container Service, Inc., and to General Refuse Service, Inc., and to Container Service Co., and to General Sanitation Corporation.

116. Frederick Stovall

The City of Dayton, Ohio.

117. Robert Stringer

Flowserve Corporation as successor to Duriron Corporation.

118. Denny Sweet

The City of Dayton, Ohio.

119. Earl Tarr

Exemption 6 -Personal Privacy

Bradford, OH 45308

Exemption 6 -Personal Privacy

Former employee of Ottoson Solvents on the northern portion of the Site now owned by Valley Asphalt
May have knowledge of operations, customers, transporters to the Site, and hazardous substances disposed of at the Site, including burial of still bottoms at the Site.

120. Jim Tharpe

Exemption 6 -Personal Privacy

Bellbrook, Ohio 45305-9739

Exemption 6 -Personal Privacy

See depositions.

121. Jerry Tompkins

Former employee of Monsanto Company; may have knowledge of the historic activities of Defendant which have resulted in the

discharge, release, or disposal, of hazardous substances, contaminates, or pollutants at or adjacent to the Site.

122. Dunny Toy
Exemption 6 -Personal Privacy
Souderton, PA 18964
Exemption 6 -Personal Privacy
Monsanto Company, a/k/a Monsanto Research Company, n/k/a Pharmacia Corporation.
123. Vernon Vencill
Exemption 6 -Personal Privacy
Arcanum, OH 45304
Exemption 6 -Personal Privacy
See deposition.
124. Clarence Wall
Exemption 6 -Personal Privacy
Xenia, Ohio 45385
See deposition.
125. John L. Wantz
Exemption 6 -Personal Privacy
Miamisburg, OH 45342
Exemption 6 -Personal Privacy
Kelsey-Hayes Company
126. Charles Watson
Exemption 6 -Personal Privacy
Kettering, OH 45420
The Dayton Power and Light Company
127. Michael Wendling
Exemption 6 -Personal Privacy
Franklin, North Carolina 28734
Exemption 6 -Personal Privacy
See depositions.
128. Diane (Dee) Werbrich, Clerk of Council, City of Moraine, or other Document Custodian
The City of Moraine
4200 Dryden Road
Moraine, Ohio 45439
129. Wayne Wertz
Exemption 6 -Personal Privacy

West Milton, OH 45383

Former employee of Industrial Waste Disposal Co., Inc.

May have knowledge of operations, customers, transporters to the Site; and hazardous substances disposed of at the Site.

130. Wayne Wheeler
Coca-Cola Refreshments USA, Inc., as successor to Dayton Coca-Cola Bottling Co.
131. Alan Williams
Former Sanitarian, Montgomery County Health District
May have knowledge of inspections and compliance monitoring of the Site, operations, types of waste disposed of, identity of generators and transporters of waste to the Site, and methods of disposal at the Site.
132. James Witham
Kimberly-Clack Corporation
133. Leslie Woods
Monsanto Company, *a/k/a* Monsanto Research Company, *n/k/a* Pharmacia Corporation.
134. Herman Woodum
Bridgestone Americas Tire Operations, LLC, as successor to The Dayton Tire & Rubber Company; Bridgestone/Firestone, Inc. *f/k/a* The Dayton Tire & Rubber Company.
135. Alan Wurstner
Exemption 6 -Personal Privacy
Dayton, Ohio 45419
Exemption 6 -Personal Privacy
See deposition.
136. Cecil Younker
Exemption 6 -Personal Privacy
Dayton, Ohio 45403
Exemption 6 -Personal Privacy
See deposition.
137. Document Custodian, U.S. EPA, Region 5.
138. Document Custodian, Ohio EPA.
139. Document Custodian, Montgomery County.

140. Unknown corporate representatives of each Defendant.
141. All persons necessary to identify and authenticate any exhibits in this case.
142. All persons identified in Plaintiffs' or any Defendant's initial disclosures, discovery responses, or lay witness lists.
143. All witnesses necessary for rebuttal or impeachment.
144. Plaintiffs reserve the right to move to amend their lay witness list in accordance with the Omnibus Scheduling Order.

Respectfully submitted,

/s/ James A. Dyer

James A. Dyer, Esq. – Trial Attorney

(Ohio Reg. No. 0006824)

Email: jdyer@ssdlaw.com

Scott Davies, Esq. – Trial Attorney

(Ohio Reg. No. 0077080)

Email: sdavies@ssdlaw.com

SEBALY SHILLITO + DYER LLP

1900 Kettering Tower

40 North Main Street

Dayton, Ohio 45423-1013

(937) 222-2500

Plaintiffs' Trial Attorneys

Larry Silver

David E. Romine

Jennifer G. Meyer

LANGSAM STEVENS SILVER &

HOLLAENDER LLP

1818 Market Street, Suite 3400

Philadelphia, PA 19103

Phone: (215) 723-3255

Fax: (215) 732-3260

Email: lsilver@lssh-law.com

dromine@lssh-law.com

jmeyer@lssh-law.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing document was filed and served upon all counsel of record via email on February 3, 2017.

/s/ Jennifer Graham Meyer
Jennifer Graham Meyer